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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

15 | In re:

16 | PG&E CORPORATION

17 || -and-

18 | PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- 20 Affects PG&E Corporation
 - 21 Affects Pacific Gas and Electric Company
 - 22 Affects both Debtors

23 *All papers shall be filed in the Lead Case,
No. 19-30088 (DM)

**Bankruptcy Case
No. 19-30088 (DM)**

Chapter 11 (Lead Case) (Jointly Administered)

**DECLARATION OF DAVID J.
RICHARDSON IN SUPPORT OF THE
OFFICIAL COMMITTEE OF TORT
CLAIMANTS' MOTION TO
ESTABLISH PROCEDURES FOR
DISCOVERY PRECEDING PLAN
CONFIRMATION**

Hearing

Date: March 10, 2020
Time: 10:00 a.m. (Pacific Time)
Place: Courtroom 17
450 Golden Gate Ave., 16th Fl.
San Francisco, CA 94102

I, David J. Richardson, hereby declare:

1. I am a member in good standing of the bar of California and I am admitted to practice in the United States Bankruptcy Court in the Northern District of California. I am counsel in the Los Angeles, California office of Baker Hostetler LLP, attorneys of record for The Official Committee of Tort Claimants (the “TCC”). I have personal knowledge of the facts stated herein and I could and would competently and truthfully testify to those facts if called as witness.

2. The TCC issued subpoenas to approximately 106 Vendors in January and February of 2020. The subpoenas requested contracts covering the Vendors' work for PG&E and documents that would identify certain indemnification agreements between Vendors and PG&E, as well as information about the Vendors' insurance coverage for the work carried out for PG&E.

3. I understand that to date, I or my colleagues who are also counsel for the TCC have collectively communicated with over 75 subpoena recipients.

4. The TCC has agreed to extend the subpoena response time for over 35 Vendors who expressed a need.

5. In some instances, the TCC has agreed to narrow the scope of the subpoena for certain Vendors. In other instances, the TCC has agreed to withdraw the subpoena.

6. Despite our efforts to resolve all issues pertaining to the scope and timing of the subpoenas, the TCC has received approximately 31 objections from Vendors, and I believe that a procedure to facilitate a streamlined approach for resolution of these and other future objections would be in the best interests of all parties and this Court.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on the 19th day of February, 2020, in San Francisco, California.

/s/ David J. Richardson

David J. Richardson